## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MAX A. RADY,

Plaintiff,

v.

THE BOSTON CONSULTING GROUP, INC. and De BEERS UK LIMITED,

Defendants.

Case No.: 1:20-cv-02285 (ALC)

Judge Andrew L. Carter, Jr.

STIPULATION AND [PROPOSED] ORDER

WHEREAS, on September 4, 2020, Plaintiff Max A. Rady filed a Second Amended Complaint ("SAC") against Defendants Boston Consulting Group, Inc. ("BCG") and De Beers UK Limited ("De Beers"). *See* ECF. No. 30.

WHEREAS, counsel for Mr. Rady, BCG, and De Beers have conferred regarding service of the SAC and the Court-ordered briefing schedule for any motion to dismiss the SAC (ECF No. 28) and have agreed as follows:

IT IS HEREBY STIPULATED AND AGREED between Mr. Rady, BCG, and De Beers, by and through their respective counsel, as follows:

- 1. BCG and De Beers accept, by and through counsel, service of process of the SAC;
- 2. The Parties will brief any motion to dismiss one or more claims asserted in the SAC pursuant to the Court-ordered schedule (ECF No. 28); and
- 3. BCG's and De Beers' response to the SAC, as to any claims that have not been dismissed, shall be due within fourteen (14) days of notice of the Court's decision on any motion to dismiss.

DATED: September 17, 2020	
WHITEFORD TAYLOR PRESTON LLP	MORRISON & FOERSTER LLP
By:	By:
Steven E. Tiller 7 St. Paul Street Baltimore, MD 21202 Telephone: (410) 347-9425 Facsimile: (410) 223-4325 Email: stiller@wtplaw.com	Kyle W.K. Mooney 250 West 55 <sup>th</sup> Street New York, NY 10019 Telephone: (212) 468-8000 Facsimile: (212) 468-7900 Email: KMooney@mofo.com
Counsel for Plaintiff, Max A. Rady	Counsel for Defendant, Boston Consulting Group, Inc.
By:  Christopher P. Borello  1270 Avenue of the Americas  New York, New York 10020  Telephone: (212) 218-2100  Facsimile: (212) 218-2200  Email: cborello@venable.com	
Counsel for Defendant, De Beers UK Limited	
SO ORDERED.	
Date:	
	Hon. Andrew L. Carter, Jr.

WHI	TEFORD TAYLOR PRESTON LLP	MORRISON & FOERSTER LLP
	Steven Tiller  Steven E. Tiller  St. Paul Street  Baltimore, MD 21202  Telephone: (410) 347-9425  Facsimile: (410) 223-4325  Email: stiller@wtplaw.com  Counsel for Plaintiff, Max A. Rady	Kyle W.K. Mooney 250 West 55 <sup>th</sup> Street New York, NY 10019 Telephone: (212) 468-8000 Facsimile: (212) 468-7900 Email: KMooney@mofo.com  Counsel for Defendant, Boston Consulting Group, Inc.
VEN	ABLE LLP	
By: _	Christopher P. Borello 1270 Avenue of the Americas New York, New York 10020 Telephone: (212) 218-2100 Facsimile: (212) 218-2200 Email: cborello@venable.com  sel for Defendant, De Beers UK Limited	

SO ORDERED.

Date: \_\_\_\_\_

Hon. Andrew L. Carter, Jr.